

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Case No. 24-18719
Ragan M Crawford)	Chapter 13
Lacy M Cloud Crawford)	Judge: Michael B. Slade
Debtors)	
Ragan M Crawford		DAVID CUTLER
Lacy M Cloud Crawford		4131 MAIN ST
949 French Dr		SKOKIE, IL 60076
Mundelein, IL 60060		

NOTICE OF MOTION

Please take notice that on April 30, 2025 at 10:30 am, a representative of this office shall appear before the Honorable Judge Michael B. Slade, or any judge sitting in that judge's place, either in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn St., Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 817 7512** and the passcode is **623389**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888
stearns_g@lisle13.com

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee

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CERTIFICATE OF SERVICE

I, Glenn Stearns,

☐ an attorney, certify

or

☒ a non-attorney, declare under penalty of perjury under the laws of the United States of America

that I served a copy of this notice and the attached motion on each entity shown below at the address shown and by the method indicated on April 18, 2025 at 5:00p.m. .

DAVID CUTLER
4131 MAIN ST
SKOKIE, IL 60076

via CM/ECF

Ragan M Crawford
Lacy M Cloud Crawford
949 French Dr
Mundelein, IL 60060

U.S. mail

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888
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/s/ Glenn Stearns

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MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtors filed a petition under Chapter 13 on Monday, December 16, 2024.
2. The Debtors have failed to:
 - a. File amended schedule(s) E/F, H and I.
 - b. File an amended plan.
3. As a result, the Debtors have failed to comply with the Bankruptcy Code and have caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888
stearns_g@lisle13.com

Respectfully Submitted;

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee